

VLADECK, RASKIN & CLARK, P.C.

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January 12, 2016

Hon. George B. Daniels, USDJ
US District Court for the
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *United States v. Ralph Nolan*, 14 Cr 0555 (GBD)

Dear Judge Daniels:

I write to respectfully request an adjournment of the above captioned sentencing hearing currently scheduled for January 20, 2016. I have sought the Government's consent.

As the Court may recall, I was appointed to represent Mr. Nolan in the above captioned matter pursuant to the CJA after his trial counsel moved to be relieved based on a conflict of interest. This was a trial of a Hobbs Act Robbery which was tried before Your Honor last year and it involved a number of eye-witnesses identifications. I was appointed after trial and before sentencing.

A comprehensive review of the trial transcript and the entire case has taken longer than anticipated and in combination with other press of business, including a trial the end of this month, I am unable to go forward with sentencing next week. I have received the client's consent to request at least a 30 – 45 day adjournment.

I respectfully request that the matter be adjourned to another date at the convenience of the Court in March or April (except not the week of March 21, 2016, please). Thank you for your time and consideration.

Respectfully submitted,

Susan J. Walsh

cc: Robert Cooper, AUSA
Russell Capone, AUSA

